

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	MM Docket No. 99-25
)	
Creation of a Low Power)	RM-9208
Radio Service)	RM-9242

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Comments of
Communications Workers of America

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The Communications Workers of America (CWA) is a labor organization representing 630,000 workers employed in radio and television broadcasting, cable television, telecommunications, publishing, and other public and private sector industries. CWA members are also consumers of broadcast services.

CWA fully supports action by the Commission to establish rules authorizing the operation of new, low power FM (LPFM) radio stations. Low power radio will enhance democratic communications by facilitating a system of community-based local radio stations, controlled and operated by the people in the communities they serve. Low power radio offers exciting potential to provide worker and community-oriented radio broadcasting services as a counter to the corporate domination of the public airwaves.

Over the past three years, there has been rapid consolidation of radio ownership in response to the relaxation of the radio multiple ownership rules under Section 202(b) of the Telecommunications Act of 1996. According to a Commission staff report, between March 1996 and November 1997, the number of owners of commercial radio stations declined by 11.7 percent, primarily due to mergers. In 1997, the top four radio owners in each Metro market account for 90 percent of total revenues, up from 80 percent the year before.¹ As a result of this consolidation, radio has transformed from our most local medium, substituting national

¹ In the Matter of 1998 Biennial Regulatory Review--Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MM Docket No. 98-35, March 13, 1998 (rel), 18-19.

management for local decision-making, eliminating newscasts, and imposing bland cookie-cutter program formats.

This consolidation weakens democracy. Without locally owned and programmed outlets, citizens cannot learn about important issues in their communities, and therefore are less able to participate fully in civic life. Furthermore, concentrated ownership reinforces the economic barriers keeping the voice of the less powerful--including workers, minorities, and women--off the air.

One result of consolidation and corporatization of radio ownership in recent years has been reduced radio coverage of worker issues. CWA is excited by the new communications possibilities that lower power radio would open up for our union, for our members in their communities, and for other labor and community groups. We envision a union local working with other community groups to establish a low power station directed to the concerns of the workforce and the surrounding community, giving voice to information exchange and entertainment that is now absent in the community.

In the past, local stations provided a portal and training ground for workers in the industry. This path to good, career jobs is being undermined by consolidation and centralization which has resulted in job loss for many workers in the industry. Micro-radio offers the possibility of a new training ground for new entrants into the radio industry workforce.

Today, radio has moved far away from the vision of its pioneers as a force for democracy. This medium, which is so well-suited to provide inexpensive, local programming of diverse voices, is instead becoming a medium for programming developed thousands of miles away by corporate owners. Low power radio would provide an important counterbalance to today's commercial radio system which has abandoned localism.

Therefore, CWA encourages the Commission to move forward expeditiously to write rules to establish a new system of low power, community-oriented radio.

Respectfully submitted,

Communications Workers of America

By 
George Kohl
Senior Executive Director

Dated: July 26, 1999

CERTIFICATE OF SERVICE

This is to certify that I have duly served these comments upon these parties on
July 26, 1999, by depositing copies of same in the United States mail, addressed as follows:


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